



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

SEP 22 2016

Massachusetts Bay Transportation Authority
Attn: Janis O. Kearney, Director of Environmental Compliance
10 Park Plaza, Room 6720
Boston, Massachusetts 02116

Re: PCB Risk-Based Disposal Approval under 40 CFR § 761.61(c)
Cabot Yard Train Building
Dorchester, Massachusetts

Dear Ms. Kearney:

This is in response to the Notification¹ by the Massachusetts Bay Transit Authority ("MBTA") for approval of a risk-based disposal plan to address polychlorinated biphenyl ("PCB")-contaminated building materials in the Cabot Yard Train Building located at 275 Dorchester Avenue in Dorchester, Massachusetts ("the Site"). PCB-contaminated building materials that are not authorized for use under 40 CFR § 761.30 and thus are prohibited under 761.20(a) are located at the Site. Specifically, PCBs have been found in caulk at greater than or equal to (" \geq ") 50 parts per million ("ppm"). Building materials located adjacent to the caulk were found to contain PCBs at greater than (" $>$ ") 1 ppm.

The Toxic Substances Control Act ("TSCA") and its implementing regulations at 40 CFR Part 761 generally prohibit the use of PCBs in any manner other than in a totally enclosed manner unless authorized by rule. The prohibition on use includes the use of products manufactured with PCBs (e.g., caulk) in concentrations \geq 50 ppm and materials that are contaminated with PCBs from such sources (i.e., *PCB remediation waste*). PCB-containing manufactured non-liquid products must be removed and disposed of as *PCB bulk product waste* in accordance with 40 CFR § 761.62. Forty CFR § 761.30(u) authorizes the use of certain materials, including *PCB remediation waste*, provided such materials are decontaminated in accordance with such regulations.

¹ Information was submitted by MBTA to support a PCB risk-based disposal approach for *PCB remediation waste* under 40 CFR § 761.61(c) and is detailed in Attachment 2. These documents comprise the Administrative Record and will be referred to as the "Notification".

Since 2009, the MBTA has conducted remediation activities to reduce PCB contamination at the Site, including removal of ≥ 50 ppm PCB-containing caulk. In the Notification, MBTA is proposing to address PCBs remaining at the Site under the risk-based disposal option at 40 CFR § 761.61(c). Attachment 3 provides a summary of the remediation activities that have been completed and that currently are proposed.

Based on its review of the information provided in the Notification, EPA has determined that the proposed risk-based disposal plan is acceptable and that the PCBs remaining at the Site will not pose an unreasonable risk of injury to health or the environment upon completion of the proposed remediation work, provided the risk evaluation following completion of the remediation work meets risk guidelines, and long-term monitoring and maintenance requirements and standards are met. EPA applies this no unreasonable risk standard in accordance with the PCB regulations at 40 CFR § 761.61(c) and the Toxic Substances Control Act, at 15 USC § 2605(e).

MBTA may proceed with the project in accordance with 40 CFR § 761.61(c); § 761.62, the Notification; and, this Approval, subject to the conditions of Attachment 1. Please be aware that as the Site owner, MBTA shall be responsible for executing a deed notice to document the permitted uses, restricted uses, and obligations and conditions which must be maintained to ensure that the PCBs remaining at the Site do not pose an unreasonable risk to building users and workers and the environment.

This Approval may be revoked, suspended and/or modified as described in Attachment 1, or if the EPA determines that implementation of this Approval may present an unreasonable risk of injury to health or the environment, or if there is a change in the Site use. Nothing in this Approval is intended or is to be construed to prejudice any right or remedy concerning PCBs or other federally-regulated contaminants at the Site otherwise available to the EPA under Section 6 of TSCA, 15 U.S.C. 2605, 40 CFR Part 761, or other provisions of federal law.

This Approval does not release the MBTA from any applicable requirements of any other federal, state or local laws or regulations, including the requirements related to cleanup and disposal of PCBs or other contaminants on the property under the Massachusetts Department of Environmental Protection ("MassDEP") regulations.

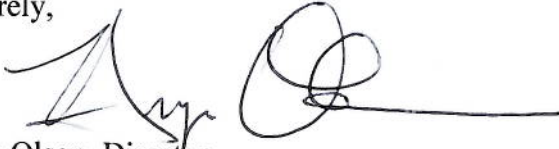
EPA encourages the compliance with greener cleanup practices for all cleanup projects, and recommends adherence to the ASTM Standard Guide to Greener Cleanups E2893-16 ("Guide") for work conducted under this Approval and the Notification. Greener cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. Please see Section 6 of the Guide for the Best Management Practices ("BMP") Process as published May 2016 (*see www.astm.org/Standards/E2893.htm for additional information*). EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB Completion Report (see Attachment 1, Condition 31) should include a section on BMP Documentation, as described in Section 6.6.5 of the Guide.

Please direct any questions and correspondence on this project to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

With exception of the long-term obligations specified in Attachment 1, including but not limited to use (Conditions 3 and 17 through 20) and long-term monitoring and maintenance (Condition 21), EPA shall consider the work authorized under this Approval complete when it has received documents evidencing construction of the physical controls at the Site (e.g., encapsulation), adoption of the deed restriction, and an acceptable risk evaluation of Site conditions. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and the terms, conditions, and restrictions of this Approval.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bryan Olson', followed by a long horizontal line.

Bryan Olson, Director
Office of Site Remediation & Restoration

Attachment 1: Risk-Based Disposal Approval Conditions
Attachment 2: Administrative Record ("Notification")
Attachment 3: Summary of PCB Remediation Activities Table

cc: Daniel White, ATC
MassDEP Boston
File

ATTACHMENT 1

**PCB RISK-BASED DISPOSAL APPROVAL CONDITIONS
CABOT YARD TRAIN BUILDING (“the Site”)
275 DORCHESTER AVENUE
DORCHESTER, MASSACHUSETTS**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB remediation waste* identified in the Notification² and located at the Site.
 - a. In the event that the Massachusetts Bay Transportation Authority (“MBTA”) identifies other PCB-contaminated wastes on the property (i.e., PCBs not identified in the Notification) subject to cleanup and disposal under the PCB regulations, the MBTA shall be required to notify EPA and to clean up the PCB-contaminated wastes in accordance with 40 CFR Part 761. In this event, the MBTA may submit a separate plan to address such other PCB-contaminated wastes or may modify the Notification to incorporate cleanup of such PCB-contaminated wastes under this Approval in accordance with Condition 22.
 - b. In the event that the MBTA elects to remove rather than to leave in-place the *PCB remediation waste* identified in the Notification (see Attachment 3), the MBTA may submit a separate plan to address the *PCB remediation waste* or may modify the Notification in accordance with Condition 22.
2. This Approval shall expire ten (10) years from the date of signature, unless extended, renewed, suspended, modified, revoked, or terminated in accordance with the conditions stated herein.
3. Application for renewal or extension of this Approval shall be made in writing at least 180 days, but not more than 270 days, prior to the expiration date. Application for renewal must include information to demonstrate that the institutional and engineered controls remain effective in mitigating risks from PCBs and that the MBTA (or a subsequent party subject to the terms of this Approval) has met and will continue to meet all conditions of this Approval. In reviewing the application for renewal, EPA will consider whether Site controls are effective, if additional measures are necessary to ensure no unreasonable risk of injury to human health or the environment, and whether Approval conditions have been met. EPA may require the submission of additional information in connection with any renewal application.

² Information was submitted by MBTA to support a PCB risk-based disposal approach for *PCB remediation waste* under 40 CFR § 761.61(c) and is detailed in Attachment 2. These documents comprise the Administrative Record and will be referred to as the “Notification”.

4. The MBTA shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
5. In the event that the activities described in the Notification differ from the terms, conditions, and restrictions specified in this Approval, the terms, conditions, and restrictions of this Approval shall govern.
6. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
7. The MBTA must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval.
8. The MBTA is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the MBTA have or receive information indicating that the MBTA or any other person have failed, or may have failed, to comply with any provision of this Approval, they must report the information to EPA in writing within twenty-four (24) hours of having or receiving the information.
9. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the MBTA are authorized to conduct the activities set forth in the Notification. The MBTA are responsible for ensuring that the selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
10. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the MBTA from compliance with any applicable requirements of TSCA or any other federal, state or local law; or 3) release the MBTA from liability for, or otherwise resolve, any violations of TSCA or any other federal, state or local law.
11. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D and is a Prohibited Act under Section 15 of TSCA, 15 U.S.C. § 2614.

NOTIFICATION AND CERTIFICATION CONDITIONS

12. This Approval may be revoked if the EPA does not receive written notification from the MBTA of its acceptance of the conditions of this Approval within ten (10) business days of receipt.

13. The MBTA shall submit the following information to EPA:
- a. a certification signed by the selected abatement contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
 - b. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval; and,
 - c. a contractor work plan, prepared and submitted by the selected abatement contractor(s) describing the means and methods of PCB removal, and the containment and air monitoring that will be employed during abatement activities. This work plan should also include information on storage, handling and disposal for **all** wastes, and on decontamination of field equipment. As a contractor work plan for the Phase 1 activities was submitted and reviewed by EPA, a new contractor work plan shall not be required for the Phase 1 activities summarized in Attachment 3, unless a new contractor is selected to conduct PCB cleanup and disposal work at the Site.

REMEDICATION AND DISPOSAL CONDITIONS

14. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools or construction of a negative air containment system with a HEPA ventilation system to control emissions, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
15. PCB-contaminated building materials shall be decontaminated, encapsulated, or removed for disposal as described in the Notification (see Attachment 3). Following completion of PCB remediation and disposal activities, the following shall apply:
- a. The MBTA shall conduct surface sampling and indoor air sampling following completion of all PCB remediation and disposal activities, including encapsulation.
 - i) Surface wipe samples of encapsulated and non-encapsulated indoor surfaces shall be collected on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu\text{g}/100\text{ cm}^2$).
 - (1) Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q. The laboratory reporting limit shall be $\leq 0.5\text{ }\mu\text{g}/100\text{ cm}^2$ PCBs.

- (2) For **encapsulated porous surfaces**, in the event that the PCB concentration of any wipe sample result is $> 1 \mu\text{g}/100 \text{ cm}^2$, the MBTA shall contact EPA for further discussion and direction on requirements and/or alternatives.
 - ii) For indoor air, sufficient sample volumes shall be collected to provide a laboratory reporting limit sufficient to meet the EPA's industrial Regional Screening Levels ("RSLs") for **total** PCBs. PCB analysis shall be conducted for PCB homologues and/or PCB congeners by EPA Method 680 or EPA Method 1668 and total PCB concentrations shall be reported by the laboratory.
 - iii) Non-encapsulated *porous surfaces* samples shall be collected on a bulk basis (i.e., mg/Kg) in accordance with the EPA Region 1 *Porous Surfaces Sampling Procedure dated May 11, 2011* to evaluate the indoor surfaces cleaning procedures that will be conducted during Phase 1 work. In the event that dust from non-encapsulated *porous surfaces* will provide exposure to building users or workers via inhalation, incidental ingestion, or dermal contact, these PCB concentrations shall be incorporated into the post-abatement human health risk evaluation (see Condition 15.b).
 - b. The MBTA shall submit to EPA a post-abatement human health risk evaluation to support the PCB remediation and disposal activities at the Site. The risk evaluation shall consider all PCB-contaminated surfaces (both encapsulated and non-encapsulated surfaces) and indoor air.
 - c. The MBTA shall submit to EPA a proposed long-term monitoring and maintenance plan ("MMP") for indoor surfaces and for indoor air in accordance with Condition 21.
16. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.
- a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination activities shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60(a).

DEED RESTRICTION AND USE CONDITIONS

17. Within thirty (30) days of completing the PCB remediation and disposal activities described in the Notification and authorized in this Approval, the MBTA shall submit for EPA review and approval, a draft deed restriction for the Site. The deed restriction shall include: a description of the extent and levels of contamination at the Site following remediation; a description of the actions taken at the Site; a description of the use restrictions for the Site, if applicable; and the long-term monitoring and maintenance requirements on the Site, which may be addressed by the long-term monitoring and maintenance plan ("MMP", see Condition 21). Within ten (10) business days of receipt of EPA's approval of the draft deed restriction, MBTA shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

SALE, LEASE, OR TRANSFER CONDITIONS

18. The MBTA, shall notify the EPA of the sale, lease or transfer of any real estate interest in the Site that has an effect of allocating or sharing any responsibility for complying with this Approval to or with a different person. Such notice shall be in writing no later than sixty (60) days prior to such action. This notification shall include the name, address, and telephone number of the new entity acquiring such an interest in the Site. In the event that the MBTA sells, leases, or transfers any such real estate interest, the MBTA shall continue to be bound by all the terms and conditions of this Approval, unless EPA approves the allocation of some or all of this Approval's responsibilities to the new owner(s), lessee or transferee. The notification procedures are as follows:
 - a. The new owner(s), lessee or transferee must request, in writing, that the EPA allocate some or all obligations and responsibilities under the Approval to the new owner(s), lessee or transferee;
 - b. The EPA reviews the request, and determines whether to allocate some or all of the obligations and responsibilities under the Approval to the new owner(s), lessee, or transferee; and,
 - c. The new owner(s), lessee or transferee provides written notification to the EPA of its acceptance of and intention to comply with the terms and conditions of the Approval or new approval, should EPA deem a new approval is necessary. The Approval or new approval may be withdrawn if the EPA does not receive written notification from the new owner(s), lessee or transferee of its acceptance of, and intention to comply with, the terms and conditions of the Approval or new approval within thirty (30) days of its receipt of the Approval or the new approval. Under such circumstances, all terms and conditions of this Approval will continue to be binding on the MBTA.

19. In the event that the sale, lease or transfer of a real estate interest in the Site will involve or result in a change in the use of the Site, EPA may revoke, suspend, and/or modify this Approval or the new approval if it finds, due to the change in use, that this PCB risk-based disposal action will not be protective of health or the environment. The owner shall record any amendment to the deed restriction, resulting from any approved modification(s), within sixty (60) days of such change(s).
20. In any sale, lease or transfer of a real estate interest in the Site, the MBTA shall retain sufficient access rights to enable it to continue to meet its obligations under this Approval, except as provided above.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

21. The MBTA shall submit for EPA's review and approval, a detailed monitoring and maintenance plan ("MMP") for the surface barriers (i.e., encapsulants) and for indoor air. The MBTA shall incorporate any changes to the MMP required by EPA.
 - a. The MMP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols and frequency, and analytical criteria; and reporting requirements.
 - b. The MMP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including on-site workers and other interested stakeholders.
 - c. The MMP shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the surface barriers.
 - d. The MBTA shall submit the results of the monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMP is necessary in order to monitor and/or evaluate the effectiveness of the encapsulants as an exposure barrier to PCBs.
 - e. Activities required under the MMP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.
22. Any modification(s) in the plan, specifications, and information submitted by the MBTA, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. The MBTA shall inform the EPA of any modification, in writing, at least ten (10) days prior to such change. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.

23. If such modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from the MBTA to make a determination regarding potential risk.
24. The MBTA shall record any amendment to the deed restriction, resulting from any approved change or modification(s), within sixty (60) days of such change(s). (See Condition 17).
25. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
26. Any misrepresentation or omission of any material fact in the Notification or in any future records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
27. Approval for these activities may be revoked, modified or otherwise altered if: EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; EPA finds that the PCBs remaining at the Site present an unreasonable risk of injury to health or the environment; EPA finds that the institutional and engineered controls are not effective in preventing PCB exposure; EPA finds that there is migration of PCBs from the Site; or EPA finds that changes are necessary to comply with new rules, standards, or guidance for such approvals. The MBTA may apply for appropriate modifications in the event new rules, standards, or guidance come into effect.
28. The MBTA shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the MBTA to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.

RECORDKEEPING AND REPORTING CONDITIONS

29. The MBTA shall prepare and maintain all records and documents required by 40 CFR Part 761, including, but not limited to, the records required by Subparts J and K. The MBTA shall maintain a written record of the PCB remediation work and the analytical sampling conducted under this Approval. All records shall be made available for inspection by authorized representatives of the EPA, until such time as EPA approves in writing a request for an alternative disposition of such records.

30. As required under Condition 21 of this Approval, the MBTA shall submit the results of the monitoring and maintenance activities to EPA as specified in the final MMP to be approved by EPA.
31. The MBTA shall submit a Final Completion Report ("Report") to the EPA in both paper and electronic format (e.g., CD-ROM) within 90 days of completion of the activities described under this Approval. At a minimum, the Report shall include: a discussion of the project activities including photo-documentation and Greener Cleanups BMPs, if implemented; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCBs removed and disposed off-site; copies of manifests and bills of lading or equivalent; and, copies of certificates of disposal or similar certifications issued by the disposer, as applicable. The Report shall also include a copy of the recorded deed restriction and a certification signed by an MBTA official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.
32. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912

Telephone: (617) 918-1527
Facsimile: (617) 918-0527
33. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self disclosure or penalty policies.

END OF ATTACHMENT 1

ATTACHMENT 2: ADMINISTRATIVE RECORD (NOTIFICATION)

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Confirmation for removal of inaccessible floor caulk behind water treatment system. MBTA Cabot Yard – Entire Train Building (Carhouse), 275 Dorchester Avenue, Dorchester, MA. Via email August 24, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Matrix of Remedial Tasks/Materials Table dated August 22, 2016. MBTA Cabot Yard – Entire Train Building (Carhouse), 275 Dorchester Avenue, Dorchester, MA. Via email August 22, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Matrix of Remedial Tasks/Materials Table dated August 16, 2016. MBTA Cabot Yard – Entire Train Building (Carhouse), 275 Dorchester Avenue, Dorchester, MA. Via email August 22, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Confirmation of disposal facility for > 50 ppm PCB remediation waste and revised Aulson Contractor Work Plan for the Phase 1 Clean-up of PCBs located throughout the MBTA Cabot Carhouse Facility dated August 9, 2016 (text only). Via email August 15, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Revised Aulson Contractor Work Plan for the Phase 1 Clean-up of PCBs located throughout the MBTA Cabot Carhouse Facility dated August 9, 2016. Via email August 11, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Responses to EPA comments on Aulson Contractor Work Plan dated July 27, 2016. MBTA Cabot Yard – Entire Train Building (Carhouse), 275 Dorchester Avenue, Dorchester, MA. Via email August 8, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Response to EPA comments on PCB-containing paint classification for Amendment #3 To Request For Approval of TSCA Risk-Based Clean-Up of PCBs, Parts I and II. MBTA Cabot Yard – Entire Train Building, 275 Dorchester Avenue, Dorchester, MA. Via email August 9, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Confirmation that miscellaneous PCB-containing caulk with < 50 ppm that is considered a PCB remediation waste will remain in-place. MBTA Cabot Yard – Entire Train Building, 275 Dorchester Avenue, Dorchester, MA. Via email August 9, 2016.

Kimberly Tisa (USEPA) to Daniel White (ATC Group Services LLC). EPA comments on PCB-containing paint classification for Amendment #3 To Request For Approval of TSCA Risk-Based Clean-Up of PCBs, Parts I and II. MBTA Cabot Yard – Entire Train Building, 275 Dorchester Avenue, Dorchester, MA. Via email August 1, 2016.

Kimberly Tisa (USEPA) to Daniel White (ATC Group Services LLC). EPA comments on Aulson Contractor Work Plan dated July 27, 2016. MBTA Cabot Yard – Entire Train Building (Carhouse), 275 Dorchester Avenue, Dorchester, MA. Via email July 31, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Aulson Contractor Work Plan for the surface decontamination of Building-Related PCBs dust and debris located throughout the MBTA Cabot Facility, July 27, 2016. Via email July 28, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Feasibility Evaluation for Request for Approval of TSCA Risk-Based Clean-Up of PCBs, MBTA Cabot Yard – Entire Train Building (Carhouse), 275 Dorchester Avenue, Dorchester, MA, dated July 21, 2016. Via email July 21, 2016.

Daniel White (ATC Group Services LLC) to Kimberly Tisa (USEPA). Revised Figure 4 of Amendment #3: Site Plan Floor Caulk joints Remaining. Via email July 13, 2016.

Michael Gitten (ATC Group Services LLC) to Kimberly Tisa (USEPA). Amendment #3 To Request For Approval of TSCA Risk-Based Clean-Up of PCBs, Parts I and II. MBTA Cabot Yard – Entire Train Building, 275 Dorchester Avenue, Dorchester, MA. July 6, 2016.

Marilyn M. Wade (URS Corporation) to Kim Tisa (USEPA Region 1), Risk Based Cleanup and Disposal Approval Checklist & Request for Approval, Cabot Car House – Entire Train Building, 275 Dorchester Avenue, Dorchester, MA. August 5, 2014.

Zubair Saleem (USEPA-HQ) to Kimberly Tisa (USEPA Region 1), Review of August 31, 2011 Request for Approval of TSCA Risk-Based Clean-Up Report and April 25, 2012 Proposed Additional Assessment and Modification Letter, Cabot Yard Train Building, Dorchester, MA. July 26, 2012

ATC Associates Inc. to Kimberly Tisa (USEPA Region 1), Proposed Additional Assessment and Modification to: Request for Approval of TSCA Risk-Based Clean-up of PCBS per 40 CFR 761, Cabot Yard – Entire Train Building, 275 Dorchester Ave., Dorchester, MA. dated August 31, 2011. April 25, 2012.

ATC Associates Inc. to Kimberly Tisa (USEPA Region 1), Request for Approval of TSCA Risk-Based Clean-up of PCBS per 40 CFR 761, Cabot Yard – Entire Train Building, 275 Dorchester Ave., Dorchester, MA., August 31, 2011.

Janis O. Kearney (MBTA) to Kimberly Tisa (USEPA Region 1), Status Update PCBs in Train Building MBTA Cabot Yard, 275 Dorchester Avenue, Dorchester, MA. June 29, 2011.

Neptune and Company (EPA contractor) Review of Worker Health Risk Assessment for MBTA Cabot Yard Facility. September 23, 2010.

Characterization of Potential Worker Health Risk, MBTA Cabot Yard, 275 Dorchester Avenue, Dorchester, MA. dated March 19, 2010. Transmitted by letter dated May 20, 2010.

TABLE

SUMMARY OF PCB REMEDIATION ACTIVITIES

MBTA Cabot Yard Carhouse, South Boston, Massachusetts

PRIMARY TASKS	AREA OF SITE BUILDING					
	Wash Alley	Hydraulic Lift Floor Area	Main Building	Interior Office Block	Basement	Exterior
Remove PCB Bulk Product Floor Caulk	2009	2009	99% in 2011; Remainder in Phase 1	N/A - Not Present	N/A - Not Present	2011 (aprons)
Remove PCB Remediation Waste Floor Caulk	Phase 1	New caulk (2009) not being removed	N/A - Not Present	N/A - Not Present	N/A - Not Present	N/A - Not Present
Remove PCB Bulk Product Wall Caulk (4 expansion wall joints only)	Phase 1	N/A - Not Present	Phase 1	N/A - Not Present	N/A - Not Present	Phase 1
Remove PCB Remediation Waste* Wall Caulk (all other wall joints)	Future if disturbed		Future if disturbed	N/A - Not Present	N/A - Not Present	Future if disturbed
Remove PCB Remediation Waste* Miscellaneous Caulk	Future if disturbed			N/A - Not Present	N/A - Not Present	Future if disturbed
PCB Remediation Waste Concrete Floor Slab Decontamination	Phase 1	N/A - Not Present	Phase 1	N/A - Not Present	Not Planned	Not Planned
PCB Remediation Waste Concrete Floor Slab Repairs/Replacement	Minimal Repairs Phase 1	Removed 2009	Minimal Repairs Phase 1	N/A - Not Present	Future if disturbed	Future if disturbed
PCB Remediation Waste Concrete Floor Slab – Epoxy Coating Entire	2009 & Phase 1	N/A - New Concrete	N/A	None (no floor joints)	None (no floor joints)	N/A
PCB Remediation Waste Concrete Floor Slab – Epoxy Coating 6-inches either side of joints	N/A	N/A - New Concrete	Phase 1	None (no floor joints)	None (no floor joints)	N/A
Four PCB Remediation Waste Wall Panel Expansion Joints – Epoxy Coating 6-inches either side of joints	Phase 1	N/A - Not Present	Phase 1	N/A - Not Present	N/A - Not Present	Phase 1
PCB Remediation Waste Concrete Wall Panel Expansion Joint Repairs/Replacement	Future if disturbed	N/A - Not Present	Future if disturbed	N/A - Not Present	N/A - Not Present	Future if disturbed
Re-caulk Floor Joints and Wall Joints Where Caulk Removed	Phase 1	N/A - New Joints	Phase 1	N/A - Not Present	N/A - Not Present	Re-caulk Wall Joints Phase 1
Remove PCB Remediation Waste Dust	Phase 1		Future if disturbed	N/A - Not Present	Future if disturbed	N/A - Not Present
Remove PCB Remediation Waste* Ceiling Paint	Peeling Paint in Phase 1 ; Future if disturbed			N/A - Not Present	N/A - Not Present	N/A - Not Present
Remove PCB Remediation Waste* Wall Paint	Future if disturbed			N/A - Not Present	N/A - Not Present	N/A - Not Present

TABLE
SUMMARY OF PCB REMEDIATION ACTIVITIES
MBTA Cabot Yard Carhouse, South Boston, Massachusetts

PRIMARY TASKS	AREA OF SITE BUILDING					
	Wash Alley	Hydraulic Lift Floor Area	Main Building	Interior Office Block	Basement	Exterior
Remove PCB Remediation Waste Floor Paint	Future if disturbed	N/A - Not Present	Future if disturbed	N/A - Not Present	N/A - Not Present	N/A - Not Present
Remove PCB Remediation Waste HVAC Components	Future	Ducts in Phase 1 ;	Remainder in Future	Not Planned	N/A	N/A
Clean Dust from Interior of Office Block HVAC Ductwork to Remain	N/A	N/A	N/A	2013	N/A	N/A
Replace HVAC System to improve air exchange	Future	Future	Partial Replacement in Phase 1 ;	Existing Will Remain	N/A	N/A
Remove PCB Remediation Waste Wood Items (e.g. pallets, shelving)	N/A - Not Present	Train Access Stairs in Future	Phase 1	N/A - Not Present	N/A - Not Present	N/A - Not Present
Vacuum Dust/Debris Management	Future, as generated	Future, as generated	Future, as generated	Future, as generated	Future, as generated	N/A
Floor Wash Water Management	Future, as generated	Future, as generated	Future, as generated	Future, as generated	Future, as generated	N/A

Notes:

Phase 1 Work being conducted in 2016/2017 by SPS/Aulson
N/A Not Applicable
Future Future capital planning project or routine O&M task
* Assumed, although could be Excluded PCB Product

Attachment 3. Page 2/2